

JUL 27 2009

Federal Communications Commission
Office of the Secretary

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
)
Section 63.71 Application of)
)
AT&T Corp.)
For Authority Pursuant to Section 63.71 of the)
Commission's Rules, 47 C.F.R. § 63.17,)
To Discontinue the Provision of Service)

SECTION 63.71 APPLICATION OF
AT&T CORP.

AT&T Corp. (AT&T) requests authority under Section 63.71 of the Commission's rules, 47 C.F.R. §63.71, to discontinue an interconnected voice over Internet Protocol (VoIP) service, known as AT&T CallVantage. As required by Section 63.71(a) and (b) of the Commission's rules, AT&T provides the following information in support of its discontinuance request:¹

Name and Address of Carrier (47 C.F.R. §§ 63.71(a)(1), (b)(2)):

AT&T Corp., 2000 W. AT&T Center Drive, Hoffman Estates, IL, 60196

Date of Planned Service Discontinuance (47 C.F.R. §§ 63.71(a)(2), (b)(2)):

AT&T intends to begin discontinuing service to customers on or after October 20, 2009, subject to Commission authorization to discontinue the service pursuant to 47 C.F.R. § 63.71(c).

¹ The Commission recently subjected interconnected VoIP providers to the section 63.71 discontinuance requirements currently applicable to non-dominant telecommunications carriers. *See IP-Enabled Services*, WC Docket No. 04-36, Report and Order, FCC 09-40 (released May 13, 2009) (*VoIP Discontinuance Order* or *Order*). The *Order* will become effective 30 days after publication in the Federal Register, *Order* ¶ 18, which has not yet occurred. In addition, pursuant to the Paperwork Reduction Act, certain of the requirements adopted in the *Order* will become effective after approval by the Office of Management and Budget, *Order* ¶ 18, which also has not yet happened. Because both of these events may occur in the coming weeks or months while AT&T is in the process of discontinuing CallVantage service, AT&T is submitting this application for discontinuance authority now to ensure a smooth discontinuance process for our customers and to ensure full compliance with the Commission's discontinuance requirements for interconnected VoIP service whenever they become effective.

Points of Geographic Areas of Service Affected (47 C.F.R. §§ 63.71(a)(3), b(2)):

AT&T will discontinue CallVantage service in all U.S. states and the District of Columbia.

Brief Description of Type of Service Affected (47 C.F.R. §§ 63.71(a)(3), b(2)):

AT&T CallVantage service is an interconnected VoIP service. *See* 47 C.F.R. § 9.3 (defining interconnected VoIP service). The discontinuance of AT&T CallVantage service does not adversely affect the public convenience and necessity because existing customers have a wide range of alternative voice services from which to choose, including other non-facilities-based VoIP services available over their existing broadband connections,² and, depending on their location, traditional wireline voice services, facilities-based VoIP services (e.g., cable or telco VoIP), and wireless voice services.

Brief Description of the Dates and Methods of Notice to All Affected Customers (47 C.F.R. § 63.71(b)(3)):

AT&T notified its customers by letter sent via US Mail on July 24, 2009. Copies of the customer notification are appended hereto as Attachment A (mailed to customers in regions where AT&T offers wireline local voice services) and Attachment B (mailed to customers in regions where AT&T does not offer wireline local voice services).

Copies of this Application are being sent, first class U.S. Mail, to the public utilities commission and governor of each state in which discontinuance is proposed and also to the Special Assistant for Telecommunications to the Secretary of Defense, as required by Section 63.71(a) of the Commission's rules.

Regulatory Classification of Carrier (47 C.F.R. § 63.71(b)(4)):

² Like other "over-the-top" VoIP services, AT&T CallVantage service requires the customer to obtain a broadband Internet access connection in order to use the service.

In its provision of CallVantage service, AT&T is considered a provider of interconnected VoIP service and, consistent with the Commission's *VoIP Discontinuance Order*, is subject to the same discontinuance requirements applicable to non-dominant carriers.

Questions about this application may be addressed to Toni Acton, AT&T Services, Inc., Director – Federal Regulatory, 1120 20th Street, NW, Suite 1000, Washington, DC 20036, (202) 457-3039.

Conclusion:

The public convenience and necessity will not be adversely affected by the discontinuance of AT&T CallVantage service because there are alternative service arrangements available to existing customers. AT&T respectfully requests that the Commission approve its Section 63.71 Application to discontinue AT&T CallVantage service.

Respectfully submitted,

/s/ Jack S. Zinman
Jack S. Zinman
Gary L. Phillips
Paul K. Mancini

Attorneys for
AT&T Corp.
1120 20th Street, N.W.
Washington, D.C. 20036
Phone: (202) 457-3053
Fax: (202) 457-3073

July 27, 2009

Attachment A



July 24, 2009

An Important Reminder about your AT&T CallVantage® Service

Sample A. Sample
Apt.123
1234 Any Street
Any Town, NM 12345-1234

RE: Your AT&T CallVantage® service - account number 123-456-7890

Dear [Customer Name],

Previously we notified you that AT&T CallVantage® service, provided by AT&T Corp., is being discontinued. As promised, we are writing to let you know that you will need to take action to transfer your service to another AT&T service or to a new service provider. All AT&T CallVantage services nationwide will be discontinued on or after October 20, 2009. You should take action to make alternative arrangements for your voice communications to avoid possible loss of your service, including the ability to reach 911 emergency services for all lines on this account.

We understand that this type of change is difficult, and we apologize for any inconvenience this change may cause. Please know that we value you as a customer and would like to continue to be your voice communications provider. AT&T does offer options to meet your voice communications needs including Wireless from AT&T, which is available nationwide. In addition, you may also consider AT&T U-verseSM Voice service, or traditional voice service, which may be available in your AT&T local service area. We encourage you to visit att.com or uverse.att.com to learn more about AT&T services and special offers that may be available in your area. If for some reason we are unable to meet your communication needs, you may also wish to consider other service providers in your area that provide voice communications.

Important notes about moving your service to AT&T or another service provider:

- AT&T CallVantage will be discontinued on or after October 20, 2009.
- You must place your order for new service to AT&T or another service provider by September 29, 2009 to ensure sufficient time for activation of your new service, including the transfer of your AT&T CallVantage number to your new service.
- You can move primary line, second line, and Softphone line numbers to a new service.
- Individual service features, such as the contents of your call logs, voice-mail greetings and messages, phone book lists, and Simple Reach and "sub account" numbers, cannot be moved to a new service.
- AT&T CallVantage billing will stop the day your number is moved to your new service. Please allow up to 3 billing cycles for all final charges, credits, and payments to post to your credit card.

What Do I Need to Do Now? Please take a minute to review the following information which will help you transition to a new voice communications service:

- 1) Visit att.com or uverse.att.com to review the AT&T services and special offers available in your area and determine what service best suits your needs.
- 2) To move your AT&T CallVantage number to another AT&T service:
 - ▶ Contact AT&T to place your order for the new service that best suits your needs and is available in your area. Once your order for service is accepted, AT&T will contact AT&T CallVantage service representatives to move your AT&T CallVantage number to your new service. You do not need to personally contact AT&T CallVantage service representatives regarding the move.

- 3) To move your AT&T CallVantage number to a new service provider other than AT&T:
- ▶ Contact your alternate service provider to place your order. Once they accept your order for service they will contact AT&T CallVantage service representatives to move your AT&T CallVantage number to your new service. You do not need to personally contact AT&T CallVantage service representatives regarding the move.
- 4) To disconnect your AT&T CallVantage service and telephone number(s) without moving to another service/service provider:
- ▶ Visit <https://www.callvantage.att.com/disconnect> and request a disconnect order. You will receive an e-mail confirmation after your account is disconnected.
 - ▶ Your disconnect request will be effective within 5 business days of your request. You will be billed up to the disconnect date.
 - ▶ Please allow up to 3 billing cycles for all final charges, credits, and payments to post to your credit card.

FCC Required Notice:

The FCC will normally authorize this proposed discontinuance of service unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible, but no later than 15 days after the Commission releases public notice of the proposed discontinuance. Address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the Sec. 63.71 Application of AT&T Corp. Comments should include specific information about the impact of this proposed discontinuance upon you or your company, including any inability to acquire reasonable substitute service.

On behalf of AT&T, the AT&T CallVantage service team wants to thank you for the opportunity to be your voice communications service provider, and we sincerely hope to continue serving your communications needs. For more information visit www.callvantage.att.com/help for a list of Frequently Asked Questions, or call an AT&T CallVantage service representative at 1-866-596-8464.

Sincerely,

Your AT&T CallVantage Customer Care Team

AT&T
ATTN: AT&T CallVantage
P.O. Box 580
Lees Summit, MO 64068

**AT&T products and services are provided or offered by subsidiaries and affiliates of AT&T Inc. under the AT&T brand and not by AT&T Inc. Not all products and services are available in all areas.*

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Attachment B



July 24, 2009

An Important Reminder about your AT&T CallVantage® Service

Sample A. Sample
Apt.123
1234 Any Street
Any Town, NM 12345-1234

RE: Your AT&T CallVantage® service - account number 123-456-7890

Dear [Customer Name],

Previously we notified you that AT&T CallVantage® service, provided by AT&T Corp., is being discontinued. As promised, we are writing to let you know that you will need to take action to transfer your service to another AT&T service or to a new service provider. **All AT&T CallVantage services nationwide will be discontinued on or after October 20, 2009. You should take action to make alternative arrangements for your voice communications to avoid possible loss of your service, including the ability to reach 911 emergency services for all lines on this account.**

We understand that this type of change is difficult, and we apologize for any inconvenience the change may cause. Please know that we value you as a customer and would like to continue to be your voice communications provider. AT&T does offer options to meet your voice communications needs including Wireless from AT&T, which is available nationwide. **We encourage you to visit att.com to learn more about AT&T services and special offers that may be available in your area.** If for some reason we are unable to meet your communication needs, you may also wish to consider other service providers in your area that provide voice communications.

Important notes about moving your service to AT&T or another service provider:

- AT&T CallVantage will be discontinued on or after **October 20, 2009.**
- You must place your order for new service to AT&T or another service provider by **September 29, 2009** to ensure sufficient time for activation of your new service, including the transfer of your AT&T CallVantage number to your new service.
- You can move primary line, second line, and Softphone line numbers to a new service.
- Individual service features, such as the contents of your call logs, voice-mail greetings and messages, phone book lists, and Simple Reach and "sub account" numbers, cannot be moved to a new service.
- AT&T CallVantage billing will stop the day your number is moved to your new service. Please allow up to 3 billing cycles for all final charges, credits, and payments to post to your credit card.

What Do I Need to Do Now? Please take a minute to review the following information which will help you transition to a new voice communications service:

- 1) Visit att.com to review the AT&T services and special offers available in your area and determine what service best suits your needs.
- 2) To move your AT&T CallVantage number to another AT&T service:
 - ▶ Contact AT&T to place your Wireless order. Once your order for service is accepted, they will contact AT&T CallVantage service representatives to move your AT&T CallVantage number to your new service. You do not need to personally contact AT&T CallVantage service representatives regarding the move.

3) To move your AT&T CallVantage number to a new service provider other than AT&T:

- ▶ Contact your alternate service provider to place your order. Once they accept your order for service they will contact AT&T CallVantage service representatives to move your AT&T CallVantage number to your new service. You do not need to personally contact AT&T CallVantage service representatives regarding the move.

4) To disconnect your AT&T CallVantage service and telephone number(s) without moving to another service/service provider:

- ▶ Visit <https://www.callvantage.att.com/disconnect> and request a disconnect order. You will receive an e-mail confirmation after your account is disconnected.
- ▶ Your disconnect request will be effective within 5 business days of your request. You will be billed up to the disconnect date.
- ▶ Please allow up to 3 billing cycles for all final charges, credits, and payments to post to your credit card.

FCC Required Notice:

The FCC will normally authorize this proposed discontinuance of service unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible, but no later than 15 days after the Commission releases public notice of the proposed discontinuance. Address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the Sec. 63.71 Application of AT&T Corp. Comments should include specific information about the impact of this proposed discontinuance upon you or your company, including any inability to acquire reasonable substitute service.

On behalf of AT&T, the AT&T CallVantage service team wants to thank you for the opportunity to be your voice communications service provider, and we sincerely hope to continue serving your communications needs. For more information visit www.callvantage.att.com/help for a list of Frequently Asked Questions, or call an AT&T CallVantage service representative at 1-866-596-8464.

Sincerely,

Your AT&T CallVantage Customer Care Team

AT&T
ATTN: AT&T CallVantage
P.O. Box 580
Lees Summit, MO 64068

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CERTIFICATE OF SERVICE

I, Shandee Parran, certify that I have this July 27, 2009 served a copy of the foregoing

Section 63.71 Application of AT&T Corp. by U.S. Mail postage prepaid to the following:

Secretary of Defense
Attn: Special Asst. for Telecommunications
Pentagon
Washington, DC 20301

Michael R. Peevey
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Rodney McDonald
Wireline Competition Bureau
445 12th Street, SW
Washington, DC 20554

Governor Arnold Schwarzenegger
Governor's Office
State Capitol Building
Sacramento, CA 95814

Alabama Public Service Commission
100 N. Union Street
Suite 850
Montgomery, AL 36130

Colorado Public Utilities Commission
1560 Broadway
Suite 250
Denver, CO 80202

Governor Bob Riley
State Capitol
600 Dexter Avenue
Montgomery, AL 36130

Governor Bill Ritter
136 State Capitol
Denver, CO 80203-1792

Arizona Corporation Commission
Commissioners Wing
1200 West Washington
Phoenix, AZ 85007-2996

Connecticut Department of Public Utilities
Control
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New Britain, CT 06051

Governor Jan Brewer
Governor of Arizona
1700 West Washington
Phoenix, AZ 85007

Governor M. Jodi Rell
Office of the Governor
State Capitol
210 Capitol Avenue
Hartford, CT 06106

Arkansas Public Service Commission
1000 Center Street
Little Rock, AR 72201

Delaware Public Service Commission
861 Silver Lake Boulevard
Cannon Building, Suite 1000
Dover, DE 19904

Governor Mike Beebe
Governor's Office
State Capitol Rm. 250
Little Rock, AR 72201

Governor Jack Markell
Tatnall Building
William Penn Street, 2nd Floor
Dover, DE 19901

District of Columbia
Public Service Commission
1333 H Street, NW
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Washington, DC 20005

Mayor Adrian Fenty
Office of the Mayor
John A. Wilson Building
1350 Pennsylvania Avenue, NW
Washington, DC 20004

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Tallahassee, FL 32399-0850

Governor Charlie Crist
Office of the Governor
The Capitol
Tallahassee, FL 32399-0001

Georgia Public Service Commission
244 Washington Street, SW
Atlanta, GA 30334

Office of the Governor
Georgia State Capitol
Atlanta, GA 30334

Idaho Public Utilities Commission
472 W. Washington Street
Boise, ID 83720-0074

Office of the Governor
P.O. Box 83720
Boise, ID 83720

Illinois Commerce Commission
527 East Capitol Ave
Springfield, IL 62701

Governor Pat Quinn
Office of the Governor
207 State House
Springfield, IL 62706

Indiana Utility Regulatory Commission
Indiana Government Center South
302 West Washington St.
Suite E-306
Indianapolis, IN 46204

Governor Mitch Daniels
Office of the Governor
Statehouse
Indianapolis, IN 46204

Iowa Utilities Board
350 Maple Street
Des Moines, IA 50319

Office of the Governor & Lt. Governor
State Capitol
1007 East Grand Ave.
Des Moines, IA 50319

Kansas Corporation Commission
Commissioners, Utilities Division, Motor
Carriers, Pipeline Safety and Energy
1500 SW Arrowhead Road
Topeka, KS 66604-4027

Governor Mark Parkinson
Office of the Governor
Capitol, 300 SW 10th Ave., Ste. 212S
Topeka, KS 66612-1590

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Frankfort, KY 40602

Governor Steve Beshear
700 Capital Avenue
Suite 100
Frankfort, KY 40601

Louisiana Public Service Commission
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602 North Fifth Street
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Baton Rouge, LA 70821

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Baton Rouge, LA 70804-9004

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Regulation
10 Park Plaza, Suite 5170
Boston, MA 02116

Governor Deval Patrick
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Baltimore, MD 21202

Governor Martin O'Malley
State House, 100 State Circle
Annapolis, MD 21401

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Augusta, ME 04333

Office of the Governor
1 State House Station
Augusta, ME 04333

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Lansing, MI 48909

Governor Jennifer M. Granholm
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Governor Haley Barbour
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Governor Jay Nixon
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Jefferson City, MO 65101

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Helena, MT 59620

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Office of the Governor
Montana State Capitol Bldg.
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Helena, MT 59620

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Lincoln, NE 68508

Office of the Governor
P.O. Box 94848
Lincoln, NE 68509-4848

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Carson City, NV 89701

Governor Jim Gibbons
State Capitol
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Carson City, NV 89701

NH Public Utilities Commission
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Concord, NH 03301

Governor John Lynch
Office of the Governor
State House
25 Capitol Street
Concord, NH 03301

New Jersey Board of Public Utilities
Two Gateway Center
Newark, NJ 07102

Governor Jon Corzine
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Trenton, NJ 08625

NM Public Regulation Commission
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P.O. Box 1269
Santa Fe, NM 87501

Office of the Governor
490 Old Santa Fe Trail
Room 400
Santa Fe, NM 87501

NY State Public Service Commission
Empire State Plaza
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Albany, NY 12223-1350

Governor David Paterson
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Albany, NY 12224

North Carolina Utilities Commission
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Dobbs Building
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Governor Beverly Perdue
Office of the Governor
20301 Mail Service Center
Raleigh, NC 27699-0301

North Dakota Public Service Commission
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Bismarck, ND 58505

Governor John Hoeven
Dept. 101
600 E. Boulevard Ave.
Bismarck, ND 58505

Public Utilities Commission of Ohio
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Governor Ted Strickland
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Columbus, Ohio 43215

Oklahoma Corporation Commission
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Oklahoma City, OK 73152-2000

Governor Brad Henry
State Capitol Building
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Oklahoma City, OK 73105

Public Utility Commission of Oregon
550 Capitol St NE #215
PO Box 2148
Salem OR 97308-2148

Governor Ted Kulongoski
160 State Capitol
900 Court Street
Salem, OR 97301-4047

Pennsylvania Public Utility Commission
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Harrisburg, PA 17105-3265

Governor Edward G. Rendell's Office
225 Main Capitol Building
Harrisburg, PA 17120

Rhode Island Public Utilities Commission
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Warwick, RI 02888

Governor Donald L. Carcieri
Office of the Governor
State House, Room 115
Providence, RI 02903

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Governor Mark Sanford
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Capitol Building, 1st floor
500 East Capitol Avenue
Pierre, SD 57501-5070

Governor Mike Rounds
Office of the Governor
500 E. Capitol Ave.
Pierre, SD 57501

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Nashville, TN 37243-0505

Governor Phil Bredesen
Governor's Office
Tennessee State Capitol
Nashville, TN 37243-0001

Vermont Public Service Board
112 State Street (Chittenden Bank Building)
Drawer 20
Montpelier, VT 05620-2701

Governor Jim Douglas
109 State Street, Pavilion
Montpelier, VT 05609-0101

Virginia State Corporation Commission
Tyler Building,
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Richmond, Virginia 23219

Governor Tim Kaine
Office of the Governor
Patrick Henry Building, 3rd Floor
1111 East Broad Street
Richmond, Virginia 23219

WA Utilities and Transportation Commission
PO Box 47250
Olympia, WA 98504-7250

Governor Christine Gregoire
Office of the Governor
PO Box 40002
Olympia, WA 98504-0002

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Charleston, WV 25323

Governor Joe Manchin III
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Charleston, WV 25305

Wyoming Public Service Commission
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Suite 300
Cheyenne, WY 82002-0010

Governor of Alaska
P.O. Box 110001
Juneau, AK 99811-0001

Governor Dave Freudenthal
Governor's Office
State Capitol, 200 West 24th Street
Cheyenne, WY 82002-0010

Public Service Commission of Wisconsin
610 North Whitney Way, P.O. Box 7854
Madison, WI 53707-7854

Governor Jim Doyle
Madison Office
P.O. Box 7863
Madison, WI 53707

Utah Division of Public Utilities
Box 146751
Salt Lake City, UT 84114-6751

Governor Jon Huntsman Jr.
State Capitol Complex
East Office Building, Suite E220
PO Box 142220
Salt Lake City, UT 84114-2220

Hawaii Public Utilities Commission
465 South King Street, Room 103
Honolulu, HI 96813

Governor Linda Lingle
Governor, State of Hawaii
Executive Chambers
State Capitol
Honolulu, HI 96813

Regulatory Commission of Alaska
701 West 8th Avenue
Suite 300
Anchorage, AK 99501-3469

/s/ Shandee R. Parran
Shandee R. Parran